

Exhibit B

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

TRACY CAEKAERT, and CAMILLIA)
MAPLEY,)
Plaintiffs,) Case No. CV-20-52-BLG-SPW
vs.)
WATCHTOWER BIBLE AND TRACT)
SOCIETY OF NEW YORK, INC.,)
WATCH TOWER BIBLE AND TRACT)
SOCIETY OF PENNSYLVANIA, and)
BRUCE MAPLEY SR.,)
Defendants,)
WATCHTOWER BIBLE AND TRACT)
SOCIETY OF NEW YORK, INC.,)
Cross Claimant,)
BRUCE MAPLEY, SR.,)
Cross Defendant.)

**DECLARATION OF
RYAN R. SHAFFER**

I, Ryan R. Shaffer, an attorney duly admitted to practice law in this Court, declares that the following is true and correct:

1. I submit this Declaration in support of Plaintiffs' Opposition to Defendant WTPA's Motion to File Amended Answer to First Amended Complaint, Cross-Claim, and Demand for Jury Trial Pursuant to Fed. R. Civ. P. 15(a)(2).
2. Plaintiffs have not settled with or released former Defendant Bruce Mapley Sr. from liability.
3. On Thursday, December 1, 2022, Plaintiffs' counsel was informed that the Defendants intended to file Motions to Amend to assert settled party defenses.
4. After WTNY filed its Motion to Amend, and before WTPA filed its Motion to Amend, I notified all defense counsel that no Plaintiff has settled with or released Bruce Mapley, Sr. Email correspondence from Ryan Shaffer to all defense counsel (Dec. 5, 2022) (attached as **Exhibit 1**).

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED this 7th day of December, 2022.

By: /s/ Ryan Shaffer
Ryan R. Shaffer
MEYER, SHAFFER & STEPANS PLLP
Attorneys for Plaintiffs

Exhibit 1

Jessica Yuhas

From: Ryan Shaffer
Sent: Monday, December 5, 2022 1:45 PM
To: Brett Jensen; Christopher Sweeney; Jon Wilson; Rob Stepans; James Murnion
Cc: Gerry Fagan; Jordan W. FitzGerald; Joel Taylor; Matthew Merrill; Katy Gannon
Subject: RE: Mapley and Caekaert v. Watch Tower

Counsel,

No plaintiff has settled with or released Bruce Mapley Sr.

I wanted you to be aware of this in the event it impacts your pending, or soon to be pending Motions to Amend.

I understand you wanted to ask Ms. Mapley about whether a settlement or release was signed during her depo. My recollection is that I let her answer those questions and she said no, then when you began asking whether she had authorized her lawyers to dismiss Mapley, I objected based on A-C privilege.

Either way, there is no settlement or release with Mapley on behalf of any Plaintiff.

Best,

Ryan R. Shaffer



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